ISO 14001:2015
How your ISO 14001 audit will be different
Whitepaper
Introduction

The new revision of ISO 14001 introduces some key changes which could impact how your environmental management system (EMS) is embedded within your organization’s strategic direction. These changes may mean that you encounter a slightly different assessment experience as we incorporate and focus on these new and enhanced requirements. This whitepaper is intended to give you some guidance as to what to expect during your audit in relation to these new requirements and help you to prepare.

A key point to emphasise is that the intended outcomes of ISO 14001 have not changed. It is defined in the scope section of the standard as follows: This International Standard specifies the requirements for an environmental management system when an organization:

a. Needs to demonstrate its ability to enhance its environmental performance, which provides value for the environment, the organization itself and interested parties, and

b. Aims to enhance environmental performance, fulfil compliance obligations and achieve environmental objectiveness.

Your management system must achieve these intended outcomes. Your BSI client manager will be looking for objective evidence to demonstrate that your organization’s systems and processes are able to deliver not only improved environmental performance but also meet any relevant statutory or regulatory requirements.
ISO 14001:2015 has a number of new requirements which will change the focus of your audit. One of the major changes is that it brings environmental management and continual improvement into the heart of an organization. This means that your environmental management system must be aligned with the strategic direction of your organization. There will be a greater need for discussions with process owners. They will need to be available during the assessments that apply to their areas of responsibility and accountability. There will also be greater emphasis on open discussions with the organization, following the move away from documented procedures. Open questions have always been part of assessment, and being able to follow the line of sight, which links strategic direction and leadership from senior management throughout the organization is important.

When auditing various processes the organization may not have a traditional document or even process flow. However there will be a process owner and, if the process is key, objectives will have been determined at the relevant levels. Using this information to review the effectiveness of the processes to meet the intended outcomes of the system is key.

Context of the organization

This is a new clause that begins setting the framework of the EMS. The ‘context of the organization’ is the clause that underpins the whole new standard and the scope of the EMS, ensuring that it is relevant to the organizations purpose and strategic direction. Organizations need to identify and understand internal and external factors and interested parties which could influence their ability to meet the intended outcomes of an EMS and their own specific needs.

Firstly, your client manager will evaluate how you identify the external and internal issues which are relevant to your organization. You’ll need to demonstrate how you identify, monitor and review the information. Secondly, you’ll need to demonstrate how you have identified and understood the needs and expectations of interested parties that are relevant to your environmental performance. It is for your organization to decide if a particular requirement of a relevant interested party is actually relevant. Once deemed relevant then their needs become compliance obligations. In other words in the 2004 version it is the ‘other requirements’ in legal and other requirements.
Leadership

Leadership is a new clause, but covers some requirements that were in the ISO 14001:2004. Top management are now required to have greater involvement in the EMS and must ensure that the requirements are integrated into the organization’s processes and that the policy and objectives are aligned with the strategic direction of the organization.

There is a greater focus on top management to commit to continual improvement of the EMS to enhance environmental performance.

Auditing Leadership is a process which usually begins with a discussion with Top Management. Your client manager will discuss many things that you will have discussed in previous assessments but there will be some new elements. These additional elements will include how top management, leaders and the leadership team ensure the EMS is compatible with the strategic direction of the organization as well as how they take responsibility and promote risk-based thinking, the importance of effective environmental management and improvement throughout the organization.

Your client manager will then use this information throughout the organization to evaluate if there is unity of purpose and direction and to determine if people are engaged in achieving the environmental objectives and improving environmental performance. This will involve a number of audit trails and is likely to include:

- talking to employees at different levels and in different areas about their objectives and how they contribute to environmental performance and improving the system
- how change is managed in the organization and if departments work together to ensure they don’t have an adverse effect on each other when making change.

Planning

Taken as a whole, Clause 6 probably presents the greatest area of change for users of earlier versions of the standard. There is an increased focus on ensuring that it is considered with the ‘context of the organization’ and ‘interested parties’. Now there is a requirement to identify risks and opportunities, the impact these may have on environmental performance, achieving the intended outcomes and how you plan to address these.

You also need to be proactively looking for opportunities to improve your performance, your processes and the overall effectiveness of your EMS.

Although there is an increased focus on risk-based thinking there is no requirement for a formal risk assessment or a documented risk management process. The concept of risk identification is intended to replace the preventive action clause in the previous revision and to promote the preventive action identification into planning rather than checking as in the 2004 version. It is entirely up to you how you identify risks within your organization; this may be through a more extensive risk management methodology or through something less formal.

The client manager will test how you have used the information relating to your internal and external issues, interested parties and aspects identification to determine your risks and opportunities as well as the decision making process you have gone through to decide what actions you are going to take.
Support

Support ensures that you have the right resources, people, knowledge and skills and infrastructure required to meet your organizational objectives and intended outcomes. Your client manager will be looking for evidence on how you determine and provide the resources needed for the environmental management system including external providers.

In relation to competence, there has been a shift from people in the organization to anyone under the organizations control who can affect the performance of the EMS. There will be no difference to the approach in auditing this requirement but there may be a wider sampling pool from which the objective evidence is selected. In addition, you need to consider changing needs and trends and how you will maintain existing knowledge and acquire additional knowledge. Your client manager will discuss how you determine and acquire the knowledge you need in your organization and how you maintain it. This may include looking at areas such as competence management systems, human resource processes or succession planning.

Documentation

The 2015 version of the standard now requires less mandatory documentation. There is no requirement for an environmental manual or documenting the procedures for control of documents, or for internal audit for example. Organizations need to ensure they have the documents and records to demonstrate that the requirements of the standard have been met and that the system is implemented effective and maintained. The client manager will establish how you have decided what documentation and records you need. They will then test this throughout the organization to see that they are available and that they provide confidence that the processes have been carried out as planned.

Operations

This part of the standard still covers the execution of plans identified in Clause 6 that took into consideration the context, interested parties, compliance obligations, significant aspects and the risks and opportunities. There are some differences and enhancements in this clause. The key ones being, control of outsourced processes, products and services, and the requirements for consistency with a life cycle perspective.

The client manager will use the information gathered from the output of planning as an audit trail input for these requirements. They will test how the actions which have been identified to address risks and opportunities have been implemented and controlled. The client manager may audit change by selecting examples of change activities and following this throughout the organization looking at the requirements of leadership, risk, communication, awareness, resources, competence, organizational knowledge and evaluation of performance to test its effectiveness.
Performance evaluation

Performance evaluation covers many of the areas previously featured in the 2004 version. Requirements for monitoring, measurement, analysis and evaluation are covered and you’ll need to consider what needs to be measured, the methods employed, when data should be analysed and when it should be reported on. The standard places more emphasis on the output of the monitoring and measuring activity and your client manager will do the same during the audit. They will review how you use this data to establish if you have achieved the intended outcomes of the standard.

Improvement

There is no significant change here in relation to the requirements of the standard. The main change is that the requirement for corrective action is more explicit. It breaks down the various stages of action i.e. correction, investigation and corrective action. You should not see any significant change in how the client manager approaches this clause.

Your client manager will be looking to ‘close the loop’ on your EMS, checking to see if what was planned was achieved, if there were deviations were they dealt with as required (this would demonstrate improvement) and how you revise/review your context and interested parties as well as your EMS scope based on the outputs of your checking and analysis to ensure it remains relevant and will allow you to achieve your intended outcomes.

Your audit is nothing to be scared of, and your client manager will not review all elements in one audit. The major changes are the clauses on the context of the organization, leadership and risk. The content of the top management discussion will be a key change and your leadership team should prepare for this.
Additional services

We also have a wide range of services to help you to implement the changes and understand how well you are doing. These include:

**Gap assessment**

A transition gap assessment is a pre-assessment service where we take a closer look at your transition plan and environmental management system comparing it with the requirements of ISO 14001:2015. As a first step in your transition journey with BSI, the gap assessment can help confirm the areas of your system already compliant and any gaps in your system, saving you time and money.

**Business improvement tools**

When you implement the revised standard it’s extremely important to manage and maintain it in the most efficient manner possible. Best practice organizations do this by deploying business improvement tools such as BSI Action Manager or Entropy software. As one of our clients told us, ‘it’s literally like having an extra member of the team’. Clients have experienced a 50% reduction in the time to implement their management system.

To find out more about BSI’s solutions to help you with the new ISO changes visit: [bsigroup.nl](http://bsigroup.nl)
Why BSI?

BSI has been at the forefront of ISO 14001 since the start. And it was originally based on BS 7750, the first environmental management system standard which was developed by BSI in 1992, the year of the first Earth Summit in Rio. That’s why we’re best placed to help you understand and transition to the new standard.

At BSI we create excellence by driving the success of our clients through standards. We enable others to perform better, manage risk and achieve sustainable growth.

For over a century our experts have been challenging mediocrity and complacency to help embed excellence into the way people and products work.

We make excellence a habit.

Our products and services

We provide a unique combination of complementary products and services, managed through our three business streams; Knowledge, Assurance and Compliance.

Knowledge

BSI works with business experts, government bodies, trade associations and consumer groups to capture best practice and structure the knowledge all organizations need to succeed. The majority of the widely used and implemented international standards were originally shaped by BSI, for example ISO 14001, Environmental Management and ISO/IEC 27001 for Information Security.

Assurance

Independent assessment of the conformity of a process or product to a particular standard ensures that our clients perform to a high level of excellence. We help our clients understand how they are performing, thereby identifying areas of improvement from within.

Compliance

To experience real, long-term benefits, our clients need to ensure ongoing compliance to a standard so that it becomes an embedded habit. We train our clients to understand standards and how to implement them, as well as provide added value and differentiated management tools to facilitate the process of ongoing compliance.

To find out more visit: bsgroup.nl